

1 RANDALL S. LUSKEY (SBN: 240915)
2 rluskey@paulweiss.com
3 **PAUL, WEISS, RIFKIND, WHARTON**
4 **& GARRISON LLP**
5 535 Mission Street, 24th Floor
6 San Francisco, CA 94105
7 Telephone: (628) 432-5100
8 Facsimile: (628) 232-3101
9
10 ROBERT ATKINS (*Pro Hac Vice* admitted)
11 ratkins@paulweiss.com
12 CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)
13 cgrusauskas@paulweiss.com
14 ANDREA M. KELLER (*Pro Hac Vice* admitted)
15 akeller@paulweiss.com
16 **PAUL, WEISS, RIFKIND, WHARTON**
17 **& GARRISON LLP**
18 1285 Avenue of the Americas
19 New York, NY 10019
20 Telephone: (212) 373-3000
21 Facsimile: (212) 757-3990

12 *Attorneys for Defendants*
13 UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

14 [Additional Counsel Listed on Following Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

20 | IN RE: UBER TECHNOLOGIES, INC.,
21 | PASSENGER SEXUAL ASSAULT
| LITIGATION

Case No. 3:23-md-03084-CRB

23 This Document Relates To:
24 ALL ACTIONS

**DECLARATION OF WILLIAM ANDERSON
IN SUPPORT OF DEFENDANTS' STATEMENT
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO CONSIDER
WHETHER ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 KYLE N. SMITH (*Pro Hac Vice* admitted)
2 ksmith@paulweiss.com
3 JESSICA E. PHILLIPS (*Pro Hac Vice* admitted)
4 jphillips@paulweiss.com
5 **PAUL, WEISS, RIFKIND, WHARTON**
6 **& GARRISON LLP**
7 2001 K Street, NW
8 Washington DC, 2006
9 Telephone: (202) 223-7300
10 Facsimile: (202) 223-7420

11 *Attorneys for Defendants*
12 UBER TECHNOLOGIES, INC.,
13 RASIER, LLC, and RASIER-CA, LLC
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF WILLIAM ANDERSON

I, William Anderson, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and a resident of Denver, CO. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s, (collectively, “Uber’s”) Statement In Support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed.

7 2. I am presently employed by Uber Technologies, Inc. as Sr. eDiscovery Analyst II.
8 I have been employed by Uber since 2016. In my role, I am familiar with Uber's various platforms
9 and internal data management tools. I am familiar with the statements made in this declaration
10 and, if called as a witness, I could and would competently and truthfully testify thereto.

11 3. I have reviewed the material at 3:16–4:7 of Plaintiffs' Brief in Support of Proposed
12 Defendant Fact Sheet. This material describes an internal data management tool that Uber uses in
13 connection with its business.

14 4. Uber treats the name of and its capabilities with this internal data management tool
15 as confidential.

16 5. If this private, commercially sensitive, and proprietary business information were
17 to be released to the public, Uber’s competitors and potential business partners would gain insight
18 into Uber’s internal business operations, potentially compromising Uber’s competitive standing.
19 This harm could occur in several ways, including by enabling competitors to replicate Uber’s data
20 management tool and practices without dedicating the time and resources necessary to develop
21 their own business operations.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 | Executed on February 6, 2024.

DocuSigned by:

William Anderson